

## **CC Docket No. 94-102 – Status Report**

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**Date:** July 31, 2009

**To:** Marlene H. Dortch, Secretary  
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### **By Electronic Submission:**

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**STATUS REPORT**  
**August, 2009**  
**CC Docket No. 94-102**

Keystone Wireless, LLC (“Keystone”) hereby submits its E911 Status Report, pursuant to *Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; Request for Waiver of Deadlines for Implementation of Phase II E911 of Key Communications, LLC and Keystone Wireless, LLC*, CC Docket No. 94-102, Order, 20 FCC Rcd 16927 ¶19 (2005).

**Carrier Identifying Information:**

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FRN 0007 4157 06

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**Information Regarding PSAPs:**

As previously reported, Keystone has received Phase I and/or Phase II requests from all nine of the PSAPs in its market, and has installed its Phase I deployments in all nine counties in its market. All of the Phase I installations in Keystone’s market are using NCAS solutions with Intrado as the central hub, which is a requirement for moving to the Phase II E-911 deployment.

Keystone is continuing to maintain regular contact with the nine in-market PSAPs and the State of Pennsylvania, and is providing them with information on the status of Keystone’s Phase II E-911 deployment. Keystone notes that neither the Pennsylvania Emergency Management Agency (“PEMA”), the agency responsible for overseeing Phase I and Phase II E-911 deployment by all state PSAPs, nor any PSAP has raised questions about Keystone’s Phase II E-911 implementation plans.

In addition, Keystone is working closely with PEMA regarding its Wireless 9-1-1 Cost Recovery Plan (“CRP”). As previously reported, Keystone’s CRP was initially submitted to PEMA in March of 2007, and it was revised in November of 2007 (CRP 2007/2008) and again in March of 2008 (CRP 2008/2009). PEMA granted partial approval of Keystone’s CRP 2008/2009. However, PEMA also informed Keystone that the approved funds would not be available to wireless carriers in that fiscal year because all funds already had been committed to PSAPs. Consequently, funding from PEMA will depend on the availability of funds in fiscal year 2009/2010. Keystone timely filed an update of the CRP 2008/2009 (the CRP 2009/2010 report and request for funds) prior to the March 1, 2009 deadline. PEMA recently notified Keystone that funding will begin to be distributed in FY 2010 beginning in 3Q09 and finishing in 2Q10. Based upon the funding commitment from PEMA and barring any delays due to the

Commonwealth general budget constraints, Keystone plans to move forward with Phase II E-911 deployment.

Keystone continues to remain in contact with PEMA, and will be keeping the in-market PSAPs updated on the status of Keystone's Phase II deployment plans.

**Implementation of Phase II Service:**

As previously reported, Keystone has been working with Polaris Wireless to design a network-based Phase II solution for its market. Keystone is finalizing contract negotiations with Polaris Wireless. Once Keystone executes a definitive agreement with a Phase II manufacturer, Keystone will be able to conduct a final market study to determine the exact Phase II solution to be deployed in Keystone's market. Keystone expects to commence Phase II E-911 deployment early in the 4<sup>st</sup> quarter of 2009 with completion in the 2<sup>nd</sup> quarter 2010.

As previously reported, Keystone expects to meet the Commission's E-911 accuracy requirements in the core population areas of its market, as prescribed by Sections 20.18(h)(1) or (2) of the Commission's Rules. However, Keystone will not achieve the requisite 67% and 95% accuracy requirements at the PSAP level in all parts of the licensed area, even when Keystone implements the network-based Phase II E-911 solution, because the very rural and sparsely populated nature of the market and the distance between Keystone's cell sites makes triangulation techniques infeasible. Accordingly, Keystone likely will be required to seek a waiver from the Commission so that it may continue to operate below the accuracy standards until such time as technological advancements allow Keystone to fully comply.

**Construction of New Cells and Expansion of Coverage:**

Keystone has not built any new sites since filing its last status report. Keystone does not have any plans to construct any more new cell sites in its market in the immediate future.